

EXHIBIT 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

_____)
FINJAN, INC., a Delaware)
Corporation,)
)
Plaintiff,)
)
vs.) No. 3:17-CV-05659
) WHA
)
JUNIPER NETWORKS, INC., a)
Delaware Corporation,)
)
Defendant.)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF YULY TENORIO

VOLUME I

May 9, 2018

9:04 a.m.

1133 Innovation Way, Building A

Sunnyvale, California

REPORTED BY:

LANA L. LOPER,

RMR, CRR, CCP, CME, CLR, CSR No. 9667

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1 Sunnyvale, California;
2 Wednesday, May 9, 2018, 9:04 a.m.
3
4 THE VIDEOGRAPHER: Good morning. We are now on
5 the record.
6 This is the recorded video deposition of Yuly
7 Tenorio, in the matter of Finjan, Inc., versus Juniper
8 Networks, Inc., taken on behalf of the plaintiff,
9 Finjan.
10 This deposition is taking place at Juniper
11 Networks, Inc., 1133 Innovation Way, Building A,
12 Sunnyvale, California 94089, on May 9, 2018. The time
13 is 9:04 a.m.
14 My name is Kevin McMahon. I'm the
15 videographer, with U.S. Legal Support, located at 440
16 Montgomery Street, Suite 550, San Francisco, California,
17 94104.
18 Video and audio recording will be taking place,
19 unless all counsel have agreed to go off the record.
20 Would all present please identify themselves,
21 beginning with the witness.
22 THE WITNESS: My name is Yuly Tenorio.
23 MS. CARSON: Rebecca Carson, of Irell &
24 Manella, on behalf of Juniper Networks.
25 MR. LEE: Michael Lee, from Kramer Levin,

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1 representing Finjan.
2 THE VIDEOGRAPHER: The court reporter is Lana
3 Loper.
4 Would you please swear in the witness.
5 YULY TENORIO,
6 having been first administered an oath
7 in accordance with CCP Section 2094, was
8 examined and testified as follows:
9
10 THE VIDEOGRAPHER: Please proceed.
11
12 EXAMINATION
13 BY MR. LEE:
14 Q Where do you work?
15 A I work at Juniper Networks.
16 Q What is your position at Juniper Networks?
17 A I'm a senior software engineer.
18 Q What are your responsibilities as senior
19 software engineer?
20 A I design program tests, in charge of any -- any
21 issues that come up with the features that I am
22 responsible for.
23 Q What features are you responsible for?
24 A It varies from time to time.
25

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1 component called the Web API; the UI API; a product that
2 we call Cascade; any related features to the Web API,
3 including RDB, mostly.
4 That's what comes to mind at this moment.
5 Q You mentioned Web API, correct?
6 A Correct.
7 Q What is Web API?
8 A The Web API is the internal API that the --
9 what we call the adapters use to get new samples to
10 analyze, so made results of analyzed samples; and let
11 the SkyATP -- let the Web API know --
12 THE REPORTER: I'm sorry, SkyAP...?
13 THE WITNESS: SkyATP, let the system know
14 whether they're having any issues, like errors.
15 Primarily, it's that, uh-huh.
16 BY MR. LEE:
17 Q When you say Web API is an internal API, can
18 you elaborate?
19 Like, can you elaborate what it means to a
20 layperson, what "internally" means?
21 MS. CARSON: Objection. Form.
22 THE WITNESS: What I mean is we -- in SkyATP,
23 we have various deployments. Each deployment is its own
24 virtual private cloud. It's internal to the private
25 cloud. It's not publicly available. It's API. It's

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1 only available to the adapters that are internal to the
2 VTC.
3 There are -- some adapters are external, but
4 they're white-listed, so no one else can really
5 interface with this API.
6 Q You mentioned adapters. Which adapters?
7 MS. CARSON: Objection. Form.
8 THE WITNESS: All of the adapters interface
9 with the Web API.
10 BY MR. LEE:
11 Q Can you name the adapters?
12 A I can name the ones that come to mind: the hash
13 lookup adapter; the meta-defender adapter; greyduckling
14 adapter; the verdict engine adapter; the Reputation.
15 The URL Reputation is considered an adapter, but it's
16 not really an adapter. There's also the Reputation.
17 I think those were named hash lookup. And the,
18 what we call, the deception adapter, which interfaces
19 with Joe Sandbox.
20 THE REPORTER: Just a moment.
21 I'm having trouble -- since you're not looking
22 towards me, I'm having trouble hearing you.
23 THE WITNESS: I'm sorry.
24 THE REPORTER: I'm moving around. It's okay;
25

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1 MS. CARSON: Objection. Form.
2 THE WITNESS: If there were results available
3 for this adapter, and the file actually went through in
4 this adapter, then, yes, the results would be stored in
5 the schema-less results table.
6 MS. CARSON: We've been going about an hour.
7 Is now a good time for a break?
8 MR. LEE: Yeah, sure.
9 THE VIDEOGRAPHER: We're going off the record.
10 The time is 1:54 p.m.
11 (Discussion off the record.)
12 THE VIDEOGRAPHER: We are back on the record.
13 The time is 2:07 p.m., and this is the beginning of
14 Media No. 3, in the deposition of Yuly Tenorio, on
15 May 9, 2018.
16 Please proceed.
17 BY MR. LEE:
18 Q Previously, did you say that you had to look at
19 the source code for Joe Static in order to describe how
20 it operates?
21 A I would need to look at the source code for the
22 adapter to see -- to see how it calls. It depends on
23 what you mean by, how it operates.
24 I know that it calls the Joe Sandbox -- that
25 Joe provided binary to perform the nondynamic analysis.

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1 I know that it does do that process call.
2 Other than that, for that, I would check the
3 code. I don't know what else it does.
4 Q So you can't elaborate beyond that, without
5 looking at the code, right?
6 A Yes, I couldn't elaborate more on that, uh-huh.
7 Q Can you look at the code right now to determine
8 how Joe Static operates?
9 A All I could look up is how the adapter
10 interacts with the binary from Joe Sandbox.
11 That would not give you much, because the --
12 the meat of what the adapter would respond with would be
13 what's the output from what the Joe binary returned. So
14 probably, without looking at the code -- even with
15 looking at the code, I couldn't say exactly what it
16 does, because the meat of it is in this binary from Joe
17 Sandbox, which is a black box to us. We don't really
18 look at it.
19 Q So there's no way for you to determine --
20 there's no way for you to describe how Joe Static
21 operates?
22 MS. CARSON: Objection. Form.
23 THE WITNESS: Not beyond what I just said,
24 which is Joe Static, the adapter that we wrote, it calls
25 this binary that we treat as a black box basically.

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1 because we don't know exactly what it does. We just get
2 an output, giving this path to the file.
3 BY MR. LEE:
4 Q If you had the source code, would you be able
5 to describe the output of Joe Static?
6 MS. CARSON: Objection. Form.
7 THE WITNESS: I don't know. It depends on the
8 source code.
9 I haven't -- I don't remember seeing it, so I
10 don't know exactly what it does with the output. I
11 don't know if, for example, it just gets it and called
12 over to the API to submit the result or if it does
13 something else. I don't recall.
14 BY MR. LEE:
15 Q Can you look at the source code during a break
16 and describe what kind of results are outputted from Joe
17 Static?
18 MS. CARSON: Objection. Form.
19 And we don't have the source code here, so...
20 THE WITNESS: I -- no.
21 BY MR. LEE:
22 Q If you did have the source code here, would you
23 be able to describe what results that Joe Static
24 outputted?
25 MS. CARSON: Objection. Form.

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1 THE WITNESS: As you answered this -- asked
2 this already, and I answered, I don't know what the
3 source code -- the source code says.
4 All I know is that it calls the binary from Joe
5 Sandbox, which is a black box. I don't know if it does
6 anything with the output of this analysis or does it
7 actually try to get things. I don't know.
8 So I don't know how much I would be able to get
9 from looking at the source code.
10 BY MR. LEE:
11 Q Are you aware of which features does --
12 THE REPORTER: I'm sorry, does?
13 BY MR. LEE:
14 Q -- does greyduckling extract from PDF?
15 MS. CARSON: Objection. Form.
16 THE WITNESS: You asked this earlier.
17 Do you want to refer to that answer?
18 BY MR. LEE:
19 Q I don't remember you saying what features are
20 that are extracted by greyduckling in a PDF.
21 A I answered this question already, and
22 specifically for the PDF stuff, which is, again, not
23 something I have worked on for greyduckling.
24 What I recall is that it can -- I believe some
25 of the features is make the header of the file, the

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1 Joe Static results from the Joe Sandbox binary, to
2 perform nondynamic analysis. But that's my opinion.
3 BY MR. LEE:
4 Q Do you see there's three cylindrical figures
5 under the internal compromise detection box?
6 A I see that.
7 Q Do you have any understanding of what those
8 three cylindrical figures represent?
9 MS. CARSON: Objection. Form.
10 THE WITNESS: Based on seeing this document for
11 the first time, my opinion would be that those signify
12 databases in the general term, without saying which kind
13 of database they mean.
14 For C&C events, for example, we use MySQL to
15 keep events from -- we keep a database for -- MySQL
16 database for every customer that we have. So it's
17 self-contained to the customer.
18 For every customer, we have a table for events,
19 of C&C events, so that we can display them on SkyATP UI.
20 I think that is what this second C&C events mean.
21 For example, identified malware, I would -- my
22 opinion would be that it means what the Results DB
23 component would get from querying the schema-less
24 database, when asking it for, what is the score,
25 numerical score, for a given sample.

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1 And for analytics, my opinion would be that it
2 is talking about how we keep track of what a single user
3 inside a customer's network has done that could be
4 indicative of malicious behavior, such as contacting a
5 server that it shouldn't have or talking to weird ports,
6 thinks like that.
7 BY MR. LEE:
8 Q Is there a separate database for analytics that
9 is separate from DynamoDB and MySQL?
10 MS. CARSON: Objection. Form.
11 THE WITNESS: We have many databases that we
12 use inside of SkyATP.
13 We have Redis, for example, which is a key
14 value store database in which --
15 THE REPORTER: We have what?
16 THE WITNESS: Redis, R-e-d-i-s.
17 In Redis, we keep track of some counters which
18 could count as analytics.
19 In MySQL, we have -- we keep track of the
20 customers' host or users.
21 We just have a lot of things that could count
22 as analytics. I don't know what the author really
23 meant.
24 BY MR. LEE:
25 Q Do you know of any other databases that store

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1 adapter results, other than DynamoDB?
2 MS. CARSON: Objection. Form.
3 THE WITNESS: SkyATP stores results from
4 adapters in the schema-less DynamoDB results table, as
5 well as the storage solution from AWS, which is called
6 S3, when the results are really large. So it's both.
7 BY MR. LEE:
8 Q Do you have any idea of how S3 organizes the
9 data it stores?
10 A S3 is an AWS solution. I don't have insight
11 into how S -- AWS S3 is coded.
12 For us, it's a black box. It's basically a
13 file system. We just push this file. And when we want,
14 we give it a path, and it gets the whole file. It's
15 like a file system.
16 Q So you don't have any understanding of how S3
17 stores its data?
18 A As a black box, I would say that it's a cloud
19 solution distributed, because you can get it from any --
20 any subnet within your -- your VPC is distributed. It
21 autoscales, so you can put lots and lots of files in
22 there, and it doesn't slow down.
23 I don't know how -- how they're doing it
24 inside, because I don't work for AWS. But that's how we
25 treat it. It's just a file disk.

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1 Q Are you aware of any data stored in DynamoDB
2 that is not stored in S3?
3 MS. CARSON: Objection. Form.
4 THE WITNESS: Can you be more specific?
5 What do you mean? What data? What other data?
6 Can you repeat your question?
7 BY MR. LEE:
8 Q Are you aware of any data stored in DynamoDB
9 that's not stored in S3?
10 MS. CARSON: Objection. Form.
11 THE WITNESS: So SkyATP has a lot of data.
12 I mean, any -- there's a lot of data that's not
13 in Dynamo, that could be Redis, for example. It can be
14 in S3. There can be in MySQL. So it really depends on
15 what specifically you're asking about.
16 What kind of data are you referring to?
17 BY MR. LEE:
18 Q For example, the sample ID and the results,
19 both of that is stored in S3, right?
20 A That is not what I said prior.
21 We store adaptive results, all of them, both in
22 schema-less DynamoDB and S3, when the results are really
23 large.
24 To my knowledge, we don't store results from
25 adapters anywhere else.